

1 KATHLEEN BLISS, ESQ. (NV Bar #7606)
2 Email: kb@kathleenblisslaw.com
3 **KATHLEEN BLISS LAW, PLLC**
4 1070 West Horizon Ridge Parkway, Suite 202
5 Henderson, Nevada 89012
6 Tele: (702) 463-9074

7 **-and-**

8 PAUL S. PADDA, ESQ. (NV Bar #10417)
9 Email: psp@paulpaddalaw.com
10 DAVID J. STANDER, ESQ. (*Admitted PHV*)
11 Email: dstanderlaw@gmail.com
12 **PAUL PADDA LAW, PLLC**
13 4560 South Decatur Blvd., Suite 300
14 Las Vegas, Nevada 89103
15 Tele: (702) 366-1888

16 **-and-**

17 DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)
18 Email: dmitchell@jenner.com
19 **JENNER & BLOCK, LLP**
20 1099 New York Avenue, N.W., Suite 900
21 Washington, D.C. 20001-4412
22 Tele: (202) 639-6090

23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
(THIRD REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court's approval, to permit Plaintiff additional time, to and until November 9, 2021, to respond to Defendant's motion to dismiss which was previously filed on August 23, 2021 (ECF No. 147). Presently, Plaintiff's response is due today, November 8, 2021. This is Plaintiff's third request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. Plaintiff's counsel represent they have been working diligently on a response to the pending dispositive motion and have substantially completed it but need one additional day to obtain full review of the document before it is filed with the Court. An additional day will provide counsel for Plaintiff sufficient time to coordinate the appropriate review and file the response tomorrow. Currently, both David Stander, Esq. and Douglass Mitchell, Esq. are on the east coast. Kathleen Bliss, Esq. was required to travel out of town this morning to the east coast for a work-related matter and will also need to review the document before it is filed. Paul S. Padda, Esq. was busy attending a full-day mediation in another federal civil case. Given these competing schedules and the different time zones involved, one additional day will provide ample time to file the brief after it is fully reviewed and approved by Plaintiff's counsel.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to and until November 9, 2021 is appropriate under the circumstances. The parties further agree that Defendants shall have 30-days following Plaintiff's filing of a response within which time to file a reply.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda

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Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
6 Brian L. Bradford, Esq.
Counsel for all named Defendants

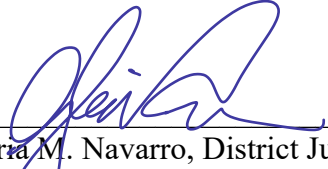
Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
Counsel for Plaintiff

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8 Dated: November 8, 2021

Dated: November 8, 2021

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13 **IT IS SO ORDERED *nunc pro tunc*.**

14 Dated this 9 day of November, 2021

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Gloria M. Navarro, District Judge
19 UNITED STATES DISTRICT COURT
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